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BY Electronic Filing

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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Fidelity Voice Services LLC
911 Compliance Status Report
WC Docket No. 05-196**

Dear Ms. Dortch:

Fidelity Voice Services LLC (“Fidelity”), by its counsel, hereby submits this report in response to the FCC letter dated March 12, 2007, requesting that Fidelity provide additional information regarding its compliance with the FCC’s 911 regulations. *See* Letter to Marc Scheer from Kathryn Berthot (March 12, 2007) (hereafter “Inquiry Letter”). As noted in Fidelity’s November 22, 2005 Compliance Letter, Fidelity presently resells to all of its end-user subscribers the VoIP services provided by New Global Telecom, Inc. (“NGT”), an unaffiliated company which is a wholesaler of VoIP services. *See* Letter to Marlene Dortch, FCC Secretary, from Marc Scheer, Vice President of Fidelity (November 22, 2005). NGT has informed us, as well as the FCC, that it has contracted with Intrado to provide end-user VoIP subscribers a nationwide 911 solution in full compliance with the FCC’s regulations. *See* Letter to Marlene Dortch, FCC Secretary, from Ron Wessel, General Counsel of NGT (November 23, 2005). Based on information provided by NGT and Intrado, as of March 30, 2007, Intrado has deployed a 911 solution in full compliance with the FCC’s rules to 4562 PSAPs in the U.S. Intrado is actively working to expand coverage to additional PSAPs. Attached as Exhibit A is a map of Intrado’s nationwide 911 network capabilities and projected deployment schedule. Attached as Exhibit B is a map showing delays in deployment Intrado is experiencing with certain PSAPs. Attached as Exhibit C is a PSAP deployment spreadsheet highlighting the specific PSAPs that have been deployed by Intrado and the target dates for those PSAPs that have not been deployed. Attached as Exhibit D is a chart summarizing Intrado’s 911 network capabilities as applied to Fidelity’s VoIP subscribers lines.

Fidelity’s responses to the FCC’s specific inquiries are as follows:

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Provision of Compliant 911 Service: Approximately 91.7% of Fidelity's VoIP subscriber lines receive 911 service in full compliance with the FCC's rules. *See* attached Exhibit D.

911 Coverage: As shown in Exhibit D, 8.3% of Fidelity's subscribers lines are in areas of the country in which Intrado has not yet deployed an FCC-compliant 911 solution. Exhibit C provides a detailed list of all PSAPs for which Intrado has not yet deployed an FCC-compliant 911 solution, and indicates, if available, the scheduled date for deployment. Fidelity does not accept new VoIP customers in areas where it is not possible to provide 911 service in compliance with the FCC rules. As Intrado deploys FCC-compliant 911 service to new PSAPs, Fidelity will accept new VoIP customers in those areas.

911 Routing Information/Connectivity to Wireline E911 Network: Fidelity is capable of transmitting 911 calls for 88.5% of its VoIP subscribers to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the selective router, the trunk line(s) between the selective router and the PSAP, and such other elements of the wireline E911 network as are necessary in those areas where selective routers are utilized. *See* attached Exhibit D. For 8.3% of Fidelity's VoIP subscribers, Intrado has identified the corresponding PSAPs as having wireline E911 network capability, however Intrado has not yet interconnected with the wireline E911 network, and in these cases Fidelity (through Intrado) routes VoIP 911 calls via the PSTN to the PSAP's emergency administrative line. Exhibit C provides further detail on Intrado's schedule for PSAPs that are not yet deployed. The remaining 3.2% of Fidelity's subscriber lines are in areas in which the PSAP does not currently use a selective router or there is some other limitation of the PSAP that prevents Fidelity (through Intrado) from providing E-911 service.

New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas: As mentioned above, Fidelity does not accept new VoIP customers in areas where it is not possible to provide 911 service in compliance with the FCC rules. Fidelity currently serves [REDACTED] subscriber lines in areas where Intrado has not yet deployed a 911 network solution that is fully compliant with the FCC's regulations (see Exhibit D), and [REDACTED] subscriber lines were provisioned with new service after November 28, 2005. Fidelity has procedures in place to ensure that no new subscribers are being provisioned in non-compliant areas.

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Respectfully submitted,

Glenn S. Richards
Tony Lin
Counsel for Fidelity Voice Services LLC

Attachments

cc: w/attachments (via electronic mail)
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Carol Simpson
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